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FILED
MAY 19 2008
CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE JEFFREY T. MILLER)

UNITED STATES OF AMERICA,	Criminal No. 08CR0650JTM
Plaintiff,	Date: May 23, 2008
	Time: 11:30 a.m.
v.	
MATTHEW WILLIAM KENNEDY	**MOTION FOR DISCOVERY; MOTION TO DISMISS FOR LACK OF PROBABLE CAUSE; MOTION TO SUPPRESS EVIDENCE AND STATEMENTS; MOTION FOR WIRETAP EVIDENCE; MOTION FOR JOINDER; MOTION TO SUPPRESS IDENTIFICATION; MOTION FOR LEAVE TO FILE FURTHER MOTIONS**

TO: KAREN HEWITT, UNITED STATES ATTORNEY, and
STEVEN DESALVO, ASSISTANT UNITED STATES ATTORNEY, and
JOHN ELLIS, ATTORNEY FOR DEFENDANT for LAWRENCE DOSS;
SHAUN KHOJAYAN, JR., ATTORNEY FOR DEFENDANT SANDRA BNI
LINDA KING for the MATERIAL WITNESSES

On Tuesday, May 23, 2008 at 11:30 a.m., or as soon thereafter as counsel may be heard, defendant, Matthew William Kennedy, by and through his attorney, Kerry Bader, will ask this Court to enter an order granting the motions listed below.

May 19, 2008

/s/Joan Kerry Bader

JOAN KERRY BADER

MOTIONS

Defendant, Matthew William Kennedy, by and through his attorney, Kerry Bader, pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby presents the following motions

1. To dismiss the Indictment;
2. To compel discovery;
3. To suppress statements and evidence;
4. Motion to suppress identification;
5. Motion for wiretap evidence;
6. Motion for joinder and
7. Motion for leave to file further motions.

This motion is based upon the notice of motions, the statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

Dated: May 19, 2008

/s/Joan Kerry Bader
JOAN KERRY BADER
Attorney for Mr. Kennedy